

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

DEVLON CHAMBERS,

Plaintiffs,

-vs-

Case No. 2014-
Hon.

CD

TRI-DIM FILTER CORPORATION,

Defendant.

_____/

Greg M. Liepshutz (P37573)
Attorney for Plaintiffs
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_____/

COMPLAINT

NOW COMES Plaintiff, DEVLON CHAMBERS, by his attorneys, GREG M. LIEPSHUTZ and LEVINE BENJAMIN, P.C., and for his Complaint against the Defendant, TRI-DIM FILTER CORPORATION, hereby state as follows:

1. That the Plaintiff, DEVLON CHAMBERS, is a resident of the City of Flint, Genesee County and State of Michigan.

2. That at all times relevant hereto, the Defendant, TRI-DIM FILTER CORPORATION, is a foreign limited partnership continuously conducting business in the County of Macomb and State of Michigan.



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3. That the subject matter of the cause of action herein involves the Defendant's discriminatory treatment of the Plaintiff on account of race in violation of the Elliott-Larsen Civil Rights Act, MCL 37.2101 et seq., and Title VII of the Civil Rights Act of 1964.

4. That Plaintiff is African American, thus, is a member of the class of persons protected under the Elliott-Larsen Civil Rights Act and Title VII of the Civil Rights Act of 1964.

5. That Plaintiff was employed with Defendant, Tri-Dim Filter Corporation, as a Process Supervisor, most recently at the location in Macomb County and State of Michigan.

6. That Defendant, through its agents, discriminated against the plaintiff by firing him for an alleged minor violation of work rules, when similar white employees were not, in addition to creating a hostile work environment.

7. That Defendant's treatment of Plaintiff, as well as other discriminatory treatment was based upon Plaintiff's race contrary to the provisions of the Elliott-Larsen Civil Rights Act and Title VII of the Civil Rights Act of 1964.

8. That Defendant, TRI-DIM FILTER CORPORATION, had actual knowledge of Plaintiff's mistreatment and failed to take corrective action.

9. That as a direct and proximate result of the Defendant, TRI-DIM FILTER CORPORATION'S, discriminatory treatment, Plaintiff has suffered injuries and damages including, but not limited to:

(a) loss of raises and wages;



- (b) loss of future fringe benefits, including, but not limited to medical, health, life insurance, vacation pay, sick leave, and any and all regularly scheduled overtime;
- (c) loss of enjoyment of the ordinary pleasures of everyday life, including the right to pursue gainful occupational choice;
- (e) mental anguish and emotional distress, shock, humiliation, loss of professional reputation and outrage.

10. That Plaintiff's damages exceed Seventy Five Thousand and 00/100 (\$75,000.00) Dollars in addition to interest, costs, and attorney fees.

WHEREFORE, the Plaintiff, DEVLON CHAMBERS, pray for Judgment in his favor against the Defendant, TRI-DIM FILTER CORPORATION, in whatever amount he is found to be entitled, in addition to costs, interest, and attorney fees.

COUNT II

11. That Plaintiff re-alleges and incorporates by reference each and every allegation as set forth in Count I.

12. That Defendant retaliated against Plaintiff after he filed a complaint with the Michigan Department of Civil Rights.

13. That Defendant's conduct violated the Michigan Whistleblowers' Protection Act.

14. That as a proximate result of Defendant's violation of the Michigan Whistleblowers' Protection Act, Plaintiff sustained damages previously described above.

WHEREFORE, the Plaintiff, DEVLON CHAMBERS, pray for Judgment in his favor against the Defendant, TRI-DIM FILTER CORPORATION, in whatever amount he is found to be entitled, in addition to costs, interest, and attorney fees.

Respectfully Submitted,

LEVINE BENJAMIN, P.C.

/S/ GREG M. LIEPSHUTZ

GREG M. LIEPSHUTZ(P37573)

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Dated: November 21, 2014



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